Case 1:13-cr-00410-NRB Document 95 Filed 07/16/14 Page 1 of 1 GARY A. FARRELL, ESQ.

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July 16, 2014

Hon. Naomi Reice Buchwald United States District Court 500 Pearl Street New York, New York 10007

Re: <u>U.S.A. v. Alexander Goldshmidt</u> 13 Cr 410 (NRB)

Dear Judge Buchwald:

I represent the defendant in the above-captioned case. The defendant has been out on a \$1,000,000 appearance bond since the inception of the case that was secured by the defendant's home located in Morganville, New Jersey and his mother's home in Brighton Beach. The defendant's home is heavily mortgaged and he owes thousands in back taxes leaving very little equity. To the contrary, his mother owns her home free and clear and it has appreciated considerably in value since last year and is now worth well over \$500,000. There have been no allegations of any violation of the conditions of his release in the more than fifteen months that this case has been pending.

The defendant is married to a woman who does not drive and they are raising two young twins less than three years old. The defendant's future is uncertain and he believes his family will be much better off living in Brooklyn near his mother than staying in an area in New Jersey where a car is a complete necessity. He wishes to sell his house and move as soon as possible to an apartment in Brooklyn. Accordingly, the defense is requesting that his home be removed from the bond without substitution to facilitate this sale. The defendant's mother's home would remain as secured property on the bond.

Assistant United States Attorney Abigail Kurland has consented to this request on behalf of the government.

rary Farrell

cc: Jennifer Burns
Abigail Kurland
Jason Masimore
Assistant United States Attorneys